

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

John K. Goodrow,	:	
Plaintiff,	:	
v.	:	Civil Action No: 3:11-cv-00020-MHL
	:	(Consolidated)
Friedman & MacFadyen, P.A. and	:	
Johnie R. Muncy,	:	
Defendants.	:	

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**JOINT MOTION TO EXTEND STAY**

The parties now jointly move for an additional extension of the stay previously entered in these consolidated matters [Docket Entry 30] for the following reasons:

1. On May 2, 2012, the parties and counsel participated in a mediation session facilitated by the Honorable Dennis Dohnal (retired) with the McCammon Group.
2. That event was fruitful in that it helped the sides better understand each other's positions.
3. Because of the significant number of claims and non-monetary considerations, as well as damages and fees issues, counsels' best efforts at the mediation and since then have not consummated in an agreement.
4. However, Plaintiffs' attorneys have been presented with a substantive good faith offer that speaks to all of the matters in dispute, and they are scheduled to reply before the end of June. Judge Dohnal remains a part of this process, to which both sides are committed.

5. The parties are hopeful that these efforts will be fruitful and achieve a global resolution; we wish to continue to focus our efforts on negotiation, rather than litigation, so long as global resolution appears to be a reachable goal.

6. Counsel for Plaintiffs concur with these sentiments and join in this motion.

For the foregoing reasons, the parties jointly request an extension of the entered stay in these matters until August 15, 2012.

DATED: June 15, 2012

**Respectfully Submitted,**

**FRIEDMAN & MACFADYEN, P.A.  
JOHNIE MUNCY**

**By Counsel**

/s/

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 15<sup>th</sup> day of June, 2012, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of electronic filing (NEF) to the following:

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